

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MANUEL ANTONIO LLUBERES RODRIGUEZ,  
a/k/a "Juan Omar Alvarez  
Veliz,"  
a/k/a "Pinocho,"  
a/k/a "Primo-Ecuadorian,"

Defendant.

COUNT ONE

The Grand Jury charges:

1. From at least in or about June 2012, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

x

:

:

:

:

:

:

x

JUDGE SWAIN

SEALED INDICTMENT

13 Cr. ( )

13 CRIM 165

SDNY  
DOCUMENT

ELECTRONICALLY FILED

LOC#:

DATE FILED: MAY 28 2014

3. The controlled substances involved in the offense were: (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) one hundred grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about October 2012, MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, arranged for the importation of cocaine from Ecuador to the United States.

b. On or about December 8, 2012, LLUBERES RODRIGUEZ made a phone call to a co-conspirator not named as a defendant herein, based in the Bronx, New York, regarding the distribution of narcotics in the United States.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about June 2012, up to and

including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, and others known and unknown, would and did import into the customs territory of the United States from a place outside thereof, and would and did import into the United States from a place outside thereof, a controlled substance, in violation of 21 U.S.C. § 952(a).

7. The controlled substances involved in the offense were: (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B)(ii); and (ii) one hundred grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(2)(A).

Overt Act

8. In furtherance of the conspiracy and to effect the

illegal object thereof, the following overt act was committed in the Southern District of New York:

a. On or about December 20, 2012, MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, spoke on the telephone with a confidential source, based in the Bronx, New York, regarding importing narcotics into the United States.

(Title 21, United States Code, Section 963.)

FORFEITURE ALLEGATION

9. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, MANUEL ANTONIO LLUBERES RODRIGUEZ, a/k/a "Juan Omar Alvarez Veliz," a/k/a "Pinocho," a/k/a "Primo-Ecuadorian," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the controlled substance offenses alleged in Counts One and Two of this Indictment.


10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

---

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

---

UNITED STATES OF AMERICA

- v. -

MANUEL ANTONIO LLUBERES RODRIGUEZ,  
a/k/a "Juan Omar Alvarez  
Veliz,"  
a/k/a "Pinocho,"  
a/k/a "Primo-Ecuadorian,"

Defendant.

---

---

SEALED INDICTMENT

---

---

13 Cr. \_\_ (\_\_\_)

(Title 21, United States Code,  
Sections 846, 963, 841(b)(1)(A),  
841(b)(1)(B), 960(b)(1)(B), &  
960(b)(2)(A))

---

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson.

---

---

3/11/13 - Filed Sealed Indictment.  
aa L/W issued.

Judge Ellis  
U.S.M.J.